

## Enfield Equality Impact Assessment (EqIA)

### Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

## Section 1 – Equality analysis details

<b>Title of service activity / policy/ strategy/ budget change/ decision that you are assessing</b>	Homelessness in Enfield (5) Placement Policy
<b>Team/ Department</b>	Housing Advisory Service
<b>Executive Director</b>	Sarah Cary
<b>Cabinet Member</b>	Cllr Savva
<b>Author(s) name(s) and contact details</b>	Richard Sorensen
<b>Committee name and date of decision</b>	Cabinet June 2023

<b>Date the EqIA was reviewed by the Corporate Strategy Service</b>	
<b>Name of Head of Service responsible for implementing the EqIA actions (if any)</b>	Richard Sorensen
<b>Name of Director who has approved the EqIA</b>	Joanne Drew

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

## Section 2 – Summary of proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

**Please summarise briefly:**

What is the proposed decision or change?

What are the reasons for the decision or change?

What outcomes are you hoping to achieve from this change?

Who will be impacted by the project or change - staff, service users, or the wider community?

1. Due to the severe and detrimental impact that this is having on residents given the resulting lack of affordable accommodation in North London, the Council must move to introduce a new approach to maximise the opportunities for residents to secure affordable accommodation. This report seeks approval to this new service model and the accompanying revised Placement Policy.
2. The lack of affordable accommodation in the local and regional area means that if we are to fulfil our statutory duties, we need to secure accommodation for households in parts of the country where Local Housing Allowance will cover all or most of the rent.
3. Keeping families in hotel accommodation is only ever an emergency solution and sets unrealistic expectations about our ability to secure affordable accommodation locally. Equally the cost of the provision to the Council is currently £850,000 per month and is unsustainable.
4. Our aim is therefore to start securing properties further afield. Where residents can secure accommodation more locally, we will continue to offer financial and practical support through our Find Your Own Home scheme. However, our primary focus will be on areas where rents are more closely aligned with Local Housing Allowance. For most residents in hotel and temporary accommodation this will mean relocating out of London and the southeast of England.
5. The new Placement Policy sets out the criteria that will be used to prioritise vulnerable residents for the extremely scarce supply of more local private rented accommodation and temporary accommodation. Accommodation procured locally will be reserved for the most vulnerable households. Other households will be expected to relocate out of the area.
6. The impact of the new policy will be on two primary groups:
  - Those households in hotel accommodation
  - Those households in more settled temporary accommodation
7. There is an immediate benefit for households currently in hotel accommodation as they will move to a self-contained home.
8. For households in settled temporary accommodation, the move to a permanent home out of area may be seen by them as disadvantageous. Their move will free up local temporary accommodation for more vulnerable households currently in hotels. For these households, relocation will provide a permanent affordable home which is not currently possible within Enfield. Most households in temporary accommodation live in nightly paid properties where there is little or no security of tenure. There is therefore a positive impact for these households.
9. The analysis is based on the 1582 households (2798 people) for whom the council has accepted a duty in the first four months of 2023.

## Section 3 – Equality analysis

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

1. Age
2. Disability
3. Gender reassignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.
6. Race
7. Religion or belief.
8. Sex
9. Sexual orientation.

At Enfield Council, we also consider socio-economic status as an additional characteristic.

“Differential impact” means that people of a particular protected characteristic (eg people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts and provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one of the following protected characteristics.

**Detailed information and guidance on how to carry out an Equality Impact Assessment is available [here](#). (link to guidance document once approved)**

**Age**

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected.

There is no differential impact on any particular age group. There is a differential impact on households with children as there is a greater shortage of supply of affordable family sized accommodation locally. Within the 1582 households the following ages were recorded:

Age	No
0-4	1
12-15	9
16-17	82
18-20	147
21-24	219
25-29	265
30-44	710
45-59	365
5-7	1
60-64	63
65-74	60
75-84	7
85-89	2
90 and over	3

In the 2021 Census, Enfield's age structure shows the working-age population to be 216,693 which is 65.7% of the population. People under the age of 16 represent 20.5% of the population, and over 65s represent 13.7% of the population.

This means that there is a disproportionate impact on working age households and older people are underrepresented within the households approaching the Council for assistance.

There are around 2900 households in more settled temporary accommodation. The breakdown of ages of the lead applicant for whom we hold data is set out below:

Age	No	%
18-25	179	6.26%
26-35	733	25.62%
36-45	936	32.72%
46-55	691	24.15%
56-65	252	8.81%
66-75	51	1.78%
75+	19	0.66%

Older people may have a greater dependency on local support networks to enable them to live independently. The Placement Policy is designed to ensure that those residents who are dependent on local support networks are prioritised for the limited supply of more local  
EqIA template approved by EMT 16<sup>th</sup> June 2020

accommodation.
<b>Mitigating actions to be taken</b>
<p>Ensure that the Placement Policy is correctly applied to enable those people who are dependent on local support networks are prioritised for local accommodation.</p> <p>Ongoing monitoring of the impact of the new policy and a review after six months</p>

<p><b>Disability</b></p> <p>A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.</p> <p>This could include: physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.</p>
<p>Will the proposed change to service/policy/budget have a <b>differential impact [positive or negative]</b> on people with disabilities?</p> <p>Please provide evidence to explain why this group may be particularly affected.</p> <p>The analysis is based on the 1582 households for whom the council has accepted a duty in the first four months of 2023. During this period 198 households included someone with a physical disability, 32 had a learning disability and 210 had disabilities caused by their mental health.</p> <p>Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home.</p> <p>There is a positive differential impact on people with a physical or mental disability as they will have greater access to affordable permanent homes. More vulnerable residents will also be prioritised for the limited supply of local accommodation through the Placement Policy, and this will disproportionately benefit both those in hotels and more settled forms of temporary accommodation.</p>
<b>Mitigating actions to be taken</b>
<p>Ensure that the Placement Policy is correctly applied to enable residents who are dependent on local health services and support networks are prioritised for local accommodation.</p> <p>Where local accommodation is not possible, ensure that similar services are available to the residents in a new location and that support with the transition is available.</p> <p>Ongoing monitoring of the impact of the new policy and a review after six months</p>

### Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

There is no differential impact on people who are or have reassigned their sex. The analysis is based on the 1582 households for whom the council has accepted a duty in the first four months of 2023. During this period 14 people stated that their gender was different to that assigned at birth and a further 25 declined to answer the question.

Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home.

People undergoing gender reassignment are often dependent on local support networks and health services. The Placement Policy is designed to ensure that people who are dependent on local health and support networks are prioritised for more local accommodation.

### Mitigating actions to be taken

Ensure that the Placement Policy is correctly applied to enable residents who are dependent on local health services and support networks are prioritised for local accommodation.

Where local accommodation is not possible, ensure that similar services are available to the residents in a new location and that support with the transition is available.

Ongoing monitoring of the impact of the new policy and a review after six months

### Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected.

There is no differential impact on households based on their relationships.

Within the 1582 households for whom the Council has accepted a duty there were:

Co-habiting	49
Divorced	28
Married	188
Separated	39
Single	724
Widowed	7

Single people, with or without children, will therefore disproportionately benefit from the new policy.

There are around 2900 other households currently living in more settled temporary accommodation. There are 629 couples living in temporary accommodation with the remainder being single people with or without children. Single adults with or without children will therefore disproportionately benefit from an increased supply of privately rented accommodation.

However, for single parent households who are more dependent on local support networks, relocation to a new area will be challenging. Whilst the Placement Policy will prioritise the more vulnerable households for local accommodation there will be a need to ensure that women have access to local support networks and provided with links to local community groups.

#### **Mitigating actions to be taken**

Ensure that the Placement Policy is correctly applied to enable residents who are dependent on local health services and support networks are prioritised for local accommodation.

Where local accommodation is not possible, ensure that similar services are available to the residents in a new location and that support with the transition is available.

Ongoing monitoring of the impact of the new policy and a review after six months



### **Pregnancy and maternity**

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected.

There is no differential impact on people who are pregnant or expecting a baby. The analysis is based on the 1582 households for whom the council has accepted a duty in the first four months of 2023. 107 women had had a baby in the previous 12 months and a further 95 were pregnant.

For expectant and new mothers, support networks are particularly important. The need for support is one of the factors to be considered as part of the placement policy, with more vulnerable households being prioritised for the limited supply of local accommodation.

Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home.

### **Mitigating actions to be taken**

Ensure that the Placement Policy is correctly applied to enable residents who are dependent on local health services and support networks are prioritised for local accommodation.

Where local accommodation is not possible, ensure that similar services are available to the residents in a new location and that support with the transition is available.

### **Race**

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people of a certain race?

Please provide evidence to explain why this group may be particularly affected.

In the first four months of 2023, the Council accepted a duty towards 1582 households. The largest groups by ethnic background are as follows:

Black or Black British - African	24%
White Other - Other	17%
White - British	14%
Black or Black British - Caribbean	8%
White Other - Turkish	6%
Any other ethnic group	6%
Mixed - Other	5%
Black or Black British - Other	3%
Don't know / refused	3%
Asian or Asian British - Bangladeshi	2%
Mixed - White and Black African	2%
Mixed - White and Black Caribbean	2%

The new policy will therefore have a differential impact on minority ethnic groups with only 14% of households being white British. This compares against the 2021 Census data where 52% of Enfield's population is white. Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home.

There are around 2900 other households currently living in more settled temporary accommodation. Of these households we hold ethnicity data on 1471 households. This reflects the fact that many households have been living in temporary accommodation before the implementation of the Homelessness Reduction Act.

There are a wide range of ethnicities within the households living in temporary accommodation. The largest groups are:

BLACK AFRICAN	24.61%
BLACK CARIBBEAN	11.83%
WHITE UK	11.01%
TURKISH	10.40%
WHITE OTHER	6.19%
OTHER ETHNIC	5.37%
SOMALIAN	4.42%
KURDISH	3.13%

Whilst the immediate focus for the new placement policy will be on households in hotel accommodation, there will be households who cannot be expected to relocate. In order to ensure that we can provide the most vulnerable households with local accommodation, the placement policy will need to apply to all households in temporary accommodation.

For these households, relocation will provide a permanent affordable home which is not currently possible within Enfield. Most households in temporary accommodation live in nightly paid properties where there is little or no security of tenure. There is therefore a positive impact for these households.

Minority households are supported by the communities that they live in, and it is important to ensure that in making out of area placements that the communities that we are placing into are supportive and sufficiently diverse.

**Mitigating actions to be taken**

We will need to ensure that we procure properties in areas where there are established minority groups to ensure that residents are not isolated in their new communities.

**Religion and belief**

Religion refers to a person’s faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

Christian households are the largest single group with 533 (33.7%) identifying as Christian. 397 households declined to answer (25.1%). The next largest groups are Muslim households with 373 (23.5%) identifying as Muslim, and 198 (12.5%) stating that they had no religion.

	No	%
Christian	533	33.7%
Prefer not to say	397	25.1%
Muslim	373	23.6%
No Religion	198	12.5%
Other	69	4.4%
Hindu	4	0.3%
Jewish	2	0.1%
Sikh	2	0.1%
Rastafarian	2	0.1%

This compares with the 2021 census data which found:

- Christian - 153,015 people or 46.4%
- Buddhist - 1,716 people or 0.5%
- Hindu - 10,231 people or 3.1%
- Jewish - 3,713 people or 1.1%
- Muslim - 61,477 people or 18.6%
- Sikh - 1,199 people or 0.4%
- Other - 98,633 people or 29.9%

There is therefore a slightly greater impact on Muslim households as they are more likely to be in need of accommodation and a slightly lower impact on Christian households.

Religious groups are supported by the communities that they live in, and it is important to ensure that in making out of area placements the communities that we are placing into are supportive and sufficiently diverse.

Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home.

**Mitigating actions to be taken**

We will need to ensure that we procure properties in areas where there are established religious groups to ensure that residents are not isolated in their new communities.

Ongoing monitoring of the impact of the new policy and a review after six months

**Sex**

Sex refers to whether you are a female or male.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on females or males?

Please provide evidence to explain why this group may be particularly affected.

Within the 1540 households for whom the Council has accepted a duty the following genders were recorded:

Gender	No
Female	1093
Male	739
Not known / Other	1
Prefer not to say	7

There is therefore a disproportionate impact on women as women make up 52% of Enfield's population but 59% of those to whom the council has accepted a duty.

Within the more settled temporary accommodation, 64% of households living in temporary accommodation are single women or single women with children.

Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home.

**Mitigating actions to be taken**

Ongoing monitoring of the impact of the new policy and a review after six months

**Sexual Orientation**

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

The analysis is based on the 1582 households for whom the council has accepted a duty in the first four months of 2023. During this period 5 people identified as not being heterosexual and another 25 decline to say. There is no identifiable differential impact on people with a particular sexual orientation.

Data on households in more settled forms of temporary accommodation is more scarce and there is insufficient data to draw a conclusion. Many of the households in temporary accommodation have been living there since before the introduction of the Homelessness Reduction Act meaning that the equalities data was not collected in key areas.

**Mitigating actions to be taken**

We are in the process of implementing a new case management system. A core aspect of this is to improve the collection and use of equalities data including for sexual orientation.

Ongoing monitoring of the impact of the new policy and a review after six months

**Socio-economic deprivation**

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

Please provide evidence to explain why this group may be particularly affected.

Homeless households are largely at the bottom end of the income spectrum. This means that households in temporary accommodation are largely dependent on benefits. The freeze on Local Housing Allowance has meant that the local private rented sector is unaffordable for the majority of households. The growing gap between benefits and rents is set out below.

	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>	<b>5 bed</b>
--	--------------	--------------	--------------	--------------	--------------

LHA 2020	£1,067	£1,296	£1,596	£1,895	£1,895
Average Rent 2021	£1,000	£1,400	£1,780	£2,090	£2,780
Average Rent 2022	£1,070	£1,510	£2,000	£2,490	£3,060
Annual change	6.80%	7.60%	12.00%	18.90%	10.10%

There is therefore a disproportionate impact on low-income households both in hotel accommodation and temporary accommodation.

Under the current arrangements households entering temporary accommodation are housed in hotel accommodation due to the shortage of both private rented and TA. The proposed change in approach will therefore have a positive impact on these households, enabling them to secure a permanent, affordable, home.

In the wider population in temporary accommodation, around 750 households would become benefit capped if they moved out of temporary accommodation. Securing affordable accommodation for these households is therefore dependent on being able to move them into employment.

**Mitigating actions to be taken.**

Identify and support households likely to be benefit capped following a move to the private rented sector. Offers of accommodation will need to be linked to employment opportunities for these households

## Section 4 – Monitoring and review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

Monitoring outcomes for households affected by the Benefit Cap will form part of the monthly performance challenge meetings for the Housing Advisory Service.

Equalities data will be linked to data on placements to ensure that there are no unintended consequences and monitored through the performance challenge meetings.

A review of the Placement Policy will be carried out in January 2024 to evaluate its impact and whether further changes are required.



## Section 5 – Action plan for mitigating actions

Any actions that are already completed should be captured in the equality analysis section above. Any actions that will be implemented once the decision has been made should be captured here.

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments
Households who would be benefit capped following a move out of TA	Employment support	Vince Rose	Ongoing	Beam contract £64k pa	Sept 2023
Ongoing monitoring	Link equalities data to placement data to enable ongoing monitoring	Lian Brian Preacher	June 2023	N/A	Monthly
Review of the placement policy	Review of the placement policy	Richard Sorensen	Jan 2024	N/A	Jan 2024
Benefit capped households unable to afford private rented accommodation	Identify households affected by the benefit cap. Support these households into employment.	Lucretia Thomas	April 2024	N/A	Sept 2023
Minority groups may be isolated in new communities	Ensure procurement in areas with diverse populations	Mark Drury	Ongoing	N/A	Sept 2023